

**IN THE UNITED STATES BANKRUPTCY COURT FOR THE  
EASTERN DISTRICT OF TENNESSEE  
AT KNOXVILLE**

IN RE:  
JERRY A. THOMPSON,  
Debtor.

CASE NO. 3:18-bk-31410-SHB  
Chapter 7

**OBJECTION OF CITIZENS FIRST BANK TO TRUSTEE'S  
PROPOSED SALE OF PROPERTY**

Citizens First Bank ("Bank"), by and through counsel, objects to the Trustee's proposed sale of the debtor's membership interest in Brimstone Recreation, LLC and the debtor's interest in real property located at 2860 Baker Highway. Bank believes that both property interests are worth more than the Trustee is proposing to sell them for and also believes that at least one higher offer will be made to the trustee. Therefore, the Bank asserts that a more appropriate way to liquidate the assets is to conduct an auction or similar type of bid process designed to maximize the sale of the above property interests.

**WHEREFORE**, Bank requests that its objection be sustained and that a process be implemented that will result in the Trustee receiving the maximum amount for the two properties at issue.

/s/ Thomas H. Dickenson  
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Thomas H. Dickenson (State Bar No. 006844)  
Attorney for Citizens First Bank  
**HODGES, DOUGHTY & CARSON, PLLC**  
P.O. Box 869  
Knoxville, Tennessee 37901-0869  
(865) 292-2307

**CERTIFICATE OF SERVICE**

I hereby certify that a true and exact copy of the foregoing **Objection to Trustee's Proposed Sale of Property**, including actual copies of the attachments or their pertinent excerpts, and has been served upon the following individuals by placing same in the U.S. Mail, postage prepaid (USM) or electronically.

Jerry Aaron Thompson (USM)  
349 Old Buffalo Road  
Oneida, TN 37841

Ann Mostoller (ECF)  
136 S. Illinois Avenue S-104  
Oak Ridge, TN 37830

W. Grey Steed (ECF)  
11167 Kingston Pike, Suite 4  
Knoxville, TN 37934

F. Scott Milligan (ECF)  
P.O. Box 12266  
Knoxville, TN 37912

This the 7<sup>th</sup> day of March 2019.

/s/Thomas H. Dickenson  
Thomas H. Dickenson